

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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U.S. DISTRICT COURT E.D.N.Y.

★ **NOV 19 2014** ★
COMPLAINT

LONG ISLAND OFFICE
Civil Action No. 14-_____

UNITED STATES OF AMERICA,

Plaintiff,

- against -

METRO DATA MANAGEMENT, INC.
d/b/a DATA MARKETING GROUP, LTD.,
KEITHA ROCCO, individually and as an
Officer of Metro Data Management, Inc., and
9097 9394 INFOGEST, QUÉBEC INC.
d/b/a INFOGEST DIRECT MARKETING,

Defendants.

CV - 14 6791

FEUERSTEIN, J

BROWN, M. J.

Plaintiff, the UNITED STATES OF AMERICA, by and through the undersigned attorneys, hereby alleges as follows:

INTRODUCTION

1. The United States brings this action for a temporary restraining order, preliminary and permanent injunctions, and other equitable relief pursuant to 18 U.S.C. § 1345, in order to enjoin the ongoing commission of criminal mail fraud in violation of 18 U.S.C. § 1341. The United States seeks to prevent continuing and substantial injury to the victims of fraud.

2. Since at least 2009 and continuing to the present, Defendants, using the United States mails, have engaged in a predatory mail fraud scheme. Defendants operate the scheme in the name of and in conjunction with Destiny Research Center, a corporation incorporated in Hong Kong, to mail solicitations to victims throughout the United States promoting various psychic and clairvoyant services and purported talismans. The solicitations are written to give

the impression that they are personalized to the individual recipient, and state that psychics Maria Duval and Patrick Guerin have had visions or have otherwise determined through the use of psychic powers that the individual recipient has the opportunity to achieve great wealth and happiness. The solicitations often state that one of the psychics has seen the individual recipient winning millions of dollars through the lottery. In reality, Defendants mail tens of thousands of nearly identical, purportedly personalized solicitations every month to consumers throughout the United States. The solicitations urge the recipient to purchase various supernatural and divinatory objects or services in order to achieve the predicted wealth. Defendants represent that these items are unique artifacts, when in reality these items are purchased in bulk and sent to thousands of consumers.

3. In response to receiving these direct mail solicitations, thousands of American consumers have sent tens of millions of dollars to the defendants.

4. For the reasons stated herein, the United States requests injunctive relief pursuant to 18 U.S.C. § 1345 to enjoin Defendants' ongoing scheme to defraud using the mail in violation of 18 U.S.C. § 1341.

JURISDICTION AND VENUE

5. The Court has subject matter jurisdiction over this action pursuant to 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345.

6. Venue lies in this district pursuant to 28 U.S.C. § 1391(b)(2).

PARTIES

7. Plaintiff is the United States of America.

8. Defendant Metro Data Management, Inc. d/b/a Data Marketing Group, Ltd. ("Data Marketing Group") is, and was at all times relevant to this action, a corporation organized

and existing under the laws of the State of New York. Data Marketing Group's principal place of business is 60 East Industry Court, Deer Park, New York, 11729, located in the Eastern District of New York.

9. Defendant Keitha Rocco is the president and CEO of Data Marketing Group. Keitha Rocco resides in Suffolk County, New York, in the Eastern District of New York.

10. Defendant 9097-9394 Québec Inc. d/b/a Infogest Direct Marketing ("Infogest") is, and was at all times relevant to this action, a corporation organized and existing under the laws of the province of Québec, Canada. In connection with the matters alleged herein, Infogest transacts or has transacted business in the Eastern District of New York and throughout the United States.

DEFENDANTS' ONGOING FRAUDULENT SCHEME

11. Beginning at least as early as 2009, Defendants have engaged in, are engaging in, and will continue to engage in a mail fraud scheme that has defrauded consumers throughout the United States out of tens of millions of dollars.

12. Destiny Research Center, a Hong Kong corporation, sends solicitation letters through the United States Postal Service to consumers throughout the United States. These solicitations promote the psychic and clairvoyant services of two individuals named "Maria Duval" and "Patrick Guerin" (collectively, "the psychics"). Destiny Research Center sends dozens of different solicitations to consumers, all styled as personalized letters, and all offering predictions of impending wealth, the opportunity to win large sums of money, or other good fortune. The solicitations misrepresent that one of the psychics learned of the specific consumer and the consumer's potential to accumulate great wealth through a dream or vision. The solicitations urge consumers to purchase various objects and psychic services as a means to

ensure that the predicted wealth and good fortune come to pass for a cost of approximately \$40-\$50. Consumers who purchase products or services in response to the solicitations are then bombarded with numerous additional, similar solicitations.

13. Destiny Research Center has sent over 56 million pieces of mail to consumers in the United States from 2006 through the present.

14. The printed solicitations are shipped by truck from Canada across the border into the United States and are deposited with the U.S. Postal Service in Albany, New York. Destiny Research Center mails solicitations in batches of as many as 20,000 or 50,000 pieces of mail at a time.

15. The solicitations contain an order form and return envelope for consumers to mail responses and payment. The return envelopes are pre-addressed to Destiny Research Center at one of three addresses. Those addresses belong to Commercial Mail Receiving Agencies (“CMRAs”) in Nevada, Illinois and Ontario, Canada. The CMRAs bundle the mail they receive from victims addressed to Destiny Research Center and forward the mail to Defendant Data Marketing Group.

16. Defendant Data Marketing Group opens all incoming mail from consumer victims, processes consumer payments, including check scanning, and enters the names, addresses and orders of consumers who respond with payments into a database. Defendants also review correspondence from consumers for refund requests. These services are known in the direct mail industry as “caging services.”

17. Data Marketing Group processes as much as \$500,000 worth of victim payments on behalf of Destiny Research Center every two weeks.

18. Data Marketing Group opens and reads mail from consumers in order to enter requests for refunds into a database. Over three separate one-week periods in 2014, Data Marketing Group received a total of approximately 1,500 letters written by consumers and addressed to “Duval” and “Guerin,” and to the psychic characters utilized by a similar scheme for which Data Marketing Group also provides caging services. The letter writers frequently discuss topics like receiving Medicare or Social Security benefits, large debts, and medical illness or ailments, and plead for the psychics to intervene and address these challenges. Many consumers complain in letters that products or services purchased are not working as promised or about the volume of solicitations received.

19. Based on these letters, Data Marketing Group knew that many victims believed they were personally corresponding with the psychics, when in fact they were recipients of form letters. Based on the text of the solicitations and the sheer volume of mail, Data Marketing Group knows that the solicitations sent by Destiny Research Center are form letters.

20. Once customer payments are entered into the database, a third-party fulfillment company sends the product ordered to the customer, along with a new solicitation offering further psychic predictions and urging the purchase of additional items and services.

21. Defendant Infogest, incorporated in and operating out of Montreal, Canada, controls Destiny Research Center’s direct mail operations in the United States. Data Marketing Group sends invoices for the caging services it performs on behalf of Destiny Research Center to Mary Thanos, a Director at Infogest. Data Marketing Group also seeks permission from Daniel Sousse, Infogest’s Customer Relationships Manager, prior to issuing large refunds to victims of the Destiny Research Center fraud, and forwards to Infogest questions from Destiny Research Center victims regarding order fulfillment.

SPECIFIC MISREPRESENTATIONS

Personal Knowledge and Personalized Predictions for Consumers

22. The solicitations misrepresent to consumers that “Maria Duval” and “Patrick Guerin” have personal knowledge of the individual recipient and that the recipient was selected to receive the mailing based on a reason other than the fact that the person’s name appears on a mailing list. The solicitations misrepresent that the psychics have seen visions of the individual recipient winning huge sums of money or receiving other good fortune. In fact, Defendants send nearly identical solicitations to tens of thousands of consumers. Defendants use a mail merge to insert the names of consumers and occasionally numeric details, such as the number appearing on a talisman, into pre-written form letters.

23. One such solicitation informs consumers that “Maria Duval” and “Patrick Guerin” both had complementary psychic visions revealing that the consumer would win substantial money through the lottery. In order to receive the lottery winnings predicted by the psychics, the solicitation urges consumers to spend \$50 to receive a talisman and the “Invaluable Guide to a New Life” and to have Maria Duval perform a “Grand Ceremony.” Specific misrepresentations contained in this solicitation include the following:

- So, now 2 internationally acclaimed psychics have predicted what your future holds in store for you...it’s fantastic news, [victim name]...take note of these 4 things that are very important for you: April 2, 2014, Powerball, Winnings, Problems Solved
- Patrick Guerin told me he had experienced incredible visions of amazing clarity, the likes of which he had rarely ever experienced...At this point, Patrick Guerin saw he could help these people and among them, he saw YOU [victim name]! Yes, this great psychic of international renown KNOWS how to help these people really win massive sums of money on games of “chance” that could make their financial woes a thing of the past.

- The most surprising thing is, [victim name]...I saw the same thing for you!...There is no doubt at all, [victim name], that you are among this small group of people about whom Patrick Guerin and I had such clear visions.

The solicitation containing the above statements is attached hereto as Exhibit A. Nearly identical solicitations were sent to thousands of other consumers. These solicitations include copies of “notes” purportedly written by the psychics during their individualized visions regarding the recipient of the solicitation. The “notes” are printed to appear hand written, but identical “notes” appear in the solicitations to other consumers, save for the name and birth date of the individual recipient.

Defendants Misrepresent That the Products and Services They Offer for Sale Are Unique and Will Bring the Purchaser Wealth and Good Fortune

24. Defendants urge recipients of their solicitations to purchase various products, such as talismans and artifacts, or psychic services, which they fraudulently represent will bring the purchaser wealth and other good fortune. Defendants misrepresent that these products and services are unique and have been developed specifically for an individual consumer. In fact, Defendants offer identical items to thousands of other consumers, and use the services of a third-party fulfillment company to ship thousands of identical items to consumers around the country. Moreover, contrary to Defendants’ misrepresentations, the purported talismans and services bring no wealth or good fortune.

25. Defendants include such misrepresentations in the solicitation attached here as Exhibit A, including the following statements:

- Patrick Guerin knows a good part of the help you’re going to need to win this money and sort out all your most urgent money problems while I know the other parts. In fact, between us, we have the solution to all your most urgent problems! We locked ourselves in for 3 days and worked together around the clock to perfect a brilliant, unique and very dynamic and personalized help plan that comes in 2 parts.

- We've written down everything we've seen for you in one unique, invaluable but very straightforward document....[With the "Invaluable Guide to New Life"], you're going to know what day and what numbers you need to play to win again and again (all you're going to need to do is check off the numbers we indicate to you on your lottery tickets).
- In celebration of your NEW LIFE, we've prepared a mysterious and extraordinary gift for you – a powerful Talisman that can attract MONEY and LUCK. It's the same Talisman that Patrick Guerin carries with him all the time. He's never shared it before, but in your case he had no hesitation. The most powerful and ancient Talisman we have ever known is now YOURS!

The talisman and the "Invaluable Guide to new Life" are offered to thousands of other consumers throughout the country through the same form letter. This is just one example of dozens of form letters that Defendants send to consumers by the thousands promising "personalized" psychic products and services.

Solicitation of Further Personal Information from Recipients Under the False Premise That Such Information Will be Used for Personalized Psychic Predictions

26. Several of the solicitations sent to consumers by Destiny Research Center request that the consumers send back further information, such as their birth date, or physical items such as hair or photographs, in order to allow the psychics to create more accurate predictions for those consumers.

27. As one example, one solicitation offers a "personal astral-clairvoyant forecast" from Maria Duval for \$45. The solicitation also encloses a green envelope and requests that consumers send back in the envelope a personal photograph or a few strands of hair. The solicitation states:

As soon as I have your photo (or the strands of hair from your head) in my possession, I am going to be able to concentrate all my psychic strengths further. I will keep the photo with me for the months and years to come so that my contact as a medium can be with you permanently, [victim name]....[Victim name], with this in hand, I can prepare your detailed personal astral-clairvoyant forecast in the next few days.

The outside of the green envelope contains instructions to place a photograph or hair inside, and states, "Once this envelope has been sealed, it may be opened ONLY by me," followed by Maria Duval's signature. In fact, employees at Data Marketing Group throw the green envelopes returned by consumers into the trash without opening them.

28. The specific misrepresentations identified in paragraphs 22 through 27 are only a few of examples of the similar misrepresentations contained in dozens of form letter solicitations utilized by Defendants. Defendants knew that the letters sent to consumers were not in fact personalized letters, but were form letters sent to thousands of consumers throughout the United States.

29. The product order pages of the solicitations contain text running vertically down the side of the page stating that "individual results may vary" and "For novelty and entertainment purposes only." The text is printed in micro print and intentionally blurred to make it barely decipherable. Recipients are highly unlikely to see, let alone read and understand this tiny print. This hidden disclaimer does nothing to counteract the overall impression conveyed by the solicitations that they contain accurate predictions of guaranteed future wealth and happiness.

HARM TO CONSUMERS

30. Consumers suffer financial losses from the lies told by Defendants. Consumers pay Defendants over \$13 million annually in response to solicitations containing the types of misrepresentations described above. The Fraud Complaint System operated by the United States Postal Inspection Service contained at least 700 complaints referencing Maria Duval or Destiny Research Center as of September 30, 2014. The Consumer Sentinel database operated by the Federal Trade Commission contained at least 500 similar complaints as of the same date. The complaints generally pertain to false representations and fraud related to the products or services provided by Duval or Guerin. Victims also complain about a lack of refunds and the large number of solicitations they receive. This harm to consumers is ongoing and will continue without the injunctive relief sought by the United States.

COUNT I

(18 U.S.C. § 1345 – Injunctive Relief)

31. The United States realleges and incorporates by reference paragraphs 1 through 29 of this Complaint as though fully set forth herein.

32. By reason of the conduct described herein, Defendants violated, are violating, and are about to violate 18 U.S.C. §§ 1341 and 1349 by executing a scheme or artifice to defraud or for obtaining money or property by means of false or fraudulent representations with the intent to defraud, and, in so doing, using the United States mails and/or a private or commercial interstate carrier.

33. Upon a showing that Defendants are committing or about to commit mail fraud, the United States is entitled, under 18 U.S.C. § 1345, to a temporary restraining order, a preliminary injunction, and a permanent injunction, restraining all future fraudulent conduct and

any other action that this Court deems just in order to prevent a continuing and substantial injury to the victims of fraud.

34. As a result of the foregoing, Defendants' conduct should be enjoined pursuant to 18 U.S.C. § 1345.

PRAYER FOR RELIEF

WHEREFORE, the plaintiff United States of America requests of the Court the following relief:

- (a) A temporary restraining order under 18 U.S.C. § 1345 as follows:
 - i. Enjoining Defendants, their agents, officers, and employees, and all other persons and entities in active concert or participation with them from committing mail fraud, as defined by 18 U.S.C. § 1341;
 - ii. Enjoining Defendants, their agents, officers, and employees, and all other persons and entities in active concert or participation with them from using the United States mails or causing others to use the mails to distribute:
 - 1. any advertisements, solicitations, or promotional materials on behalf of Destiny Research Center, Maria Duval, Patrick Guerin or any other actual or fictional individual or entity purporting to offer psychic, clairvoyant or astrological items or services for a fee;
 - 2. any advertisements, solicitations, or promotional materials that represent, directly or indirectly, expressly or impliedly, that the recipient of the solicitation was specifically selected to receive the mailing based on a reason other than the fact that the recipient's name appears on a mailing list;

3. any advertisements, solicitations, or promotional materials that represent, directly or indirectly, expressly or impliedly, that services or items offered for purchase will, or could, improve the consumer's financial condition; or
 4. any other false and misleading advertisements, solicitations, or promotional materials;
- iii. Enjoining Defendants, their agents, officers, and employees, and all other persons and entities in active concert or participation with them from receiving or causing to be delivered any incoming mail, at any address anywhere in the United States of America, which is responsive to the solicitations that are the subject of this action, or any other solicitations substantially similar thereto;
 - iv. Enjoining Defendants, their agents, officers, and employees, and all other persons and entities in active concert or participation with them from selling or offering for sale any lists of consumers or mailing lists of any type compiled from consumers who have responded to solicitations bearing the names Destiny Research Center, Maria Duval, or Patrick Guerin;
 - v. Enjoining Defendants, their agents, officers, and employees, and all other persons and entities in active concert or participation with them from performing "caging services," including processing direct mail payments and orders, credit card processing, and check scanning, with regard to direct mail solicitations on behalf of Destiny Research Center, Maria Duval, Patrick

Guerin or any other actual or fictional individual or entity purporting to offer psychic, clairvoyant or astrological items or services for a fee;

- vi. Ordering Defendants, their agents, officers, and employees, and all other persons and entities in active concert or participation with them to preserve all business, financial, accounting, and other records concerning the operations of Data Marketing Group, Infogest and any other corporate entity controlled by Defendants;
- vii. Authorizing the United States Postal Service to detain all of Defendants' incoming mail, at any address anywhere in the United States of America, which is responsive to the solicitations which are the subject of this action, or any others substantially similar thereto; and
- viii. Authorizing the United States Postal Service to detain any advertisements, solicitations, and promotional materials which are the subject of this action and any substantially similar advertisements, solicitations, and promotional materials that are deposited into the United States mails by Defendants, their agents, officers, or employees, or any other persons or entities in active concert or participation with them.

(b) A preliminary injunction on the same basis and to the same effect;

(c) A permanent injunction under 18 U.S.C. § 1345 on the same basis and to the same effect, except that paragraph (a)(vi) *supra* shall be excluded from the final order. Further, paragraph(a)(vii) *supra* shall be modified to read as follows:

Authorizing the United States Postal Service to detain *and return to sender* all of defendants' incoming mail, at any address anywhere in the United States of

America, which is responsive to the solicitations which are the subject of this action, or any others substantially similar thereto;

Paragraph (a)(viii) *supra* shall be modified to read as follows:

Authorizing the United States Postal Service to detain *and destroy* any advertisements, solicitations, and promotional materials which are the subject of this action and any substantially similar advertisements, solicitations, and promotional materials that are deposited into the United States mails by Defendants, their agents, officers, or employees, or any other persons or entities in active concert or participation with them.

(d) For such other and further relief as the Court shall deem just and proper.

Dated: November 19, 2014

LORETTA E. LYNCH
United States Attorney
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

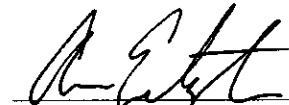


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So, now 2 internationally
acclaimed psychics have predicted
what your future holds in store for you...
it's fantastic news, [REDACTED]

T114 P1



[REDACTED] take note of these 4 things
that are very important for you:

*There is
no doubt!*

October 16, 2013,
Powerball,
Winnings,
Problems solved

September 19, 2013

Dear [REDACTED],

If you've got a special bottle of bubbly that you've
been saving for celebrating great news, then now's the
time to open it...

In fact, in exactly 27 days, I can see clearly that
the first incredible stroke of great fortune is going
to bring happiness into your life! This happy event
could be the first in a long line of lucky happenings.
But this depends on you and the decision you're going
to make in just a few moments.

(I can now tell you this: A FIRST major
lottery win, the arrival of a new life, an
important encounter, further winnings...

And now there are two of us, both psychics of
international renown, who have seen this for you!

But first, let me explain how this all started.

It all began with a strange telephone call...

At that moment, I happened to be working on some

It is an extraordinary coincidence...



Destiny Research Center

Please turn over... →



MARIA DUVAL

Holder of the highest
honorary awards
and degrees

More than 40 years
of accurate and
verifiable predictions

More than 10,000
TV appearances and
radio programs, and
featured in over 700
newspaper articles

Has never failed to
telepathically locate
missing persons
(more than 20 to date)

Ability to predict the
future confirmed in
experiments by the
greatest scientific
authorities

Has predicted
hundreds of major
events all around
the world

Consulted by
many international
celebrities

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important files, and among them YOUR FILE, because some totally new and unexpected elements had just come to light.

This new information was incredibly exciting because, as you're soon going to see, it calls for sweeping changes and improvements in your life. But then, the telephone rang...

I wouldn't normally take a telephone call while I'm doing this kind of meticulous work since it can be very distracting and I need to stay totally concentrated. But this time I had a strange feeling that this call was different. More importantly, I had a feeling that it was directly linked to the work I was doing for you. And I wasn't wrong!

When I picked up the handset, I recognized the warm, gentle voice of my friend, the renowned psychic, Patrick Guerin.

This seer has a worldwide reputation. He also has the rare and special power to make people win, win and WIN AGAIN at the lottery and other games of "chance", very often really large amounts of money (see the extra information that I have enclosed especially for you)!

One of the most amazing psychics in the world talked to me about YOU, [REDACTED]!!!

He is usually such a calm man, I had never seen him like this... He was very agitated. He said he absolutely had to know, immediately, if I was in touch with some people who have very specific characteristics (he gave me some very detailed and specific information that is complex and may not be clearly understood by people who are not initiates of the esoteric sciences).

He confided in me that it was VITAL that we match this information as quickly as possible!

I was literally stunned by his request because, as I said, I was right in the middle of working on your file and many of the specific pieces of information that he gave me were clearly and obviously linked to you, [REDACTED]. So, I asked him why he needed to know this?

He excitedly replied that he had extremely important and confidential information to give these people and that he couldn't tell me any more over the phone. He also told me he needed my help!

He and I agreed that we absolutely had to meet to discuss this in person. We agreed to meet early the next day...

I could not believe my ears!

HIS REVELATIONS ABOUT YOU AND YOUR FUTURE!

Once he was sitting down in my office, Patrick Guerin told

Go to the next page quickly to find out more...

me he had experienced incredible visions of amazing clarity, the likes of which he had rarely ever experienced.

In his visions, there were some people he didn't know although he was able make out some things about them. One of the things he knew for sure was that I was in contact with you quite often in the last few weeks.

Patrick Guerin could see that this specific group of people were plagued by some serious problems, particularly in the area of money. Their lives weren't how they wanted it to be and they often felt desperately alone, seeking a way out of their current situation.

At this point, Patrick Guerin saw he could help these people and among them, he saw YOU [REDACTED]. Yes, this great psychic of international renown KNOWS how to help these people really win massive sums of money on games of "chance" that could make their financial woes a thing of the past. He also had easy solutions to the other important problems they are currently battling!

"I know I can easily change their lives, Maria!" he told me.

But the strangest part of the story is that in his vision, this great psychic and seer wasn't alone in giving his help to these few very specific people because I, Maria Duval, was providing them with valuable, vital help as well!

The most surprising thing is, [REDACTED]...

I saw the same thing for you!

When Patrick Guerin had finished, I was in a state of shock. Basically, I'd seen the same thing for you, [REDACTED]. The money, the changes, the new life...

Money, big changes and a new life...

There's no doubt at all, I [REDACTED] that you are among this small group of people about whom Patrick Guerin and I had such clear visions. Too many very specific pieces of information that he gave to me are so clearly linked to you that it simply cannot be a coincidence.

Do you remember I [REDACTED] earlier when I told you that just before I got that telephone call I was also working on your file? Well it was precisely because I had seen these changes in your future that I had picked up your file and was getting ready to write to you! You can imagine my amazement.

Yes [REDACTED], I too have seen you win an initial large sum of money on the lottery, and I've also seen that all your

*Read more about this unbelievable coincidence
involving you, please turn...*

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most urgent problems are going to find a happy and positive solution!

Can you imagine the situation? Two acclaimed and respected psychics having the same visions about you at the same time! And in those visions, we both saw you winning a large sum of money on the lottery very soon and solving all those urgent problems that have been casting a shadow over your life until now! In such circumstances, how could everything we've seen for you not come true! Two psychics of international renown can't be wrong!

That could never happen!

So, now you're going to better understand why what Patrick Guerin told me came as such a shock! Surely, you can no longer doubt that your life really is going to change and money and happiness are finally going to be by your side!

We've compared our notes and too many things fit that it simply CANNOT be just a coincidence!

When Patrick Guerin had finished telling me what he'd seen in your future I had not a shadow of doubt that you were a part of his visions. I then explained what I had seen... almost the same things! He wasn't surprised because, as I mentioned, in his vision he'd seen that I was going to help.

We both wanted to be absolutely certain there was no mistake and that we were both talking about the same individuals, including you in this case, [REDACTED]. So, we showed each other our notes which I attached at the end of this letter. And as you can see, it REALLY fits! The message is perfectly clear for both of us!

You are going to find the sum of money each of us saw you receiving

Patrick Guerin knows a good part of the help you're going to need to win this money and sort out all your most urgent money problems while I know the other parts. In fact, between us, we have the solution to all your most urgent problems!

That's why [REDACTED] we've decided to join forces and pool our knowledge to help you!

*It has never
been seen before!*

We've pooled our knowledge and our skill to
maximize your chances to win all this money
and solve your problems!

From our respective visions, it was crystal clear that for you to receive this first big win and to sort out your problems, Patrick Guerin and I must work together and pool our knowledge and skill. And that's just what we've done.

We locked ourselves in for 3 days and worked together around the clock to perfect a brilliant, unique and very

Details of this help on the next page...

Exhibit A

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dynamic and personalized help plan that comes in 2 parts.

But first, you must understand [REDACTED] that with this help you are definitely going to be able to get access very quickly to this first important sum of money and see all your most urgent problems disappear!

Action 1: Your invaluable GUIDE to your NEW LIFE

We've written down everything we've seen for you in one unique, invaluable but very straightforward document. If you read this guide, you're going to have all the tips and information you need to seize the opportunities that come your way, at exactly the right moment.

For example, you're going to know what day and what numbers you need to play to win again and again (all you're going to need to do is check off the numbers we indicate to you on your lottery tickets). You're going to know exactly what you need to do to change your life, sort out your problems and many more things besides. It's all clearly explained in a straightforward manner, simply follow the instructions that Patrick Guerin and I are going to give you.

Action 2: Our EFFECTIVE aid and support!

With this Guide and the support and psychic assistance I talked about above, you are guaranteed to receive from life all that you are owed and entitled to expect... in other words, money and the solution of your current problems.

Money and the solution of your problems
are right there, within your reach, and you
need do just one thing to grasp them!

Patrick Guerin and I have seen it: With our help, money and happiness are going to come into your life! It's written in your future. All you have to do, to see your life change is grasp the hand of friendship we are holding out to you. The rest, absolutely everything else, is up to that great psychic Patrick Guerin and myself, Maria Duval.

Let us use the power of our vibrations and luck and money is going to flow into your life, as surely as they seem to be avoiding you now.

Most importantly of all, you must accept these changes as they happen to you, because an opportunity that you ignore is an opportunity that usually NEVER SHOWS UP AGAIN!

For all this happiness to fill your life, for money to make your life brim with all the wonderful joys it can bestow, for Lady Luck to finally smile on your life...

All you need do is fill out and return, as soon as possible,

More really good news. Please turn now....

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the Special Assistance Form on the last page of this letter.

More importantly, do it right away because, if I may remind you, we saw that the first positive event is set to happen in your life in just a few days' time! So, act now.

GOOD NEWS! We are offering a part of our help for free!

You may perhaps be thinking that assistance as special as we are offering you today could be very expensive. There are, after all, going to be two very renowned psychics acting on your behalf and working very hard for you.

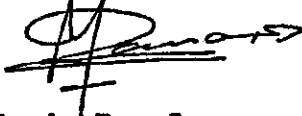
But as you know, we are not motivated by money. What we want, more than anything, is your happiness! That would be the best reward we could ask for.

That's why we've decided, together, to offer you the first part of our assistance for free. All you'll have to pay for is the preparation and first-class shipping fees of sending your Invaluable Guide for a New Life to you.

But that's not all! For us to be sure you're not taking even the slightest risk, we are also offering you a full and unconditional money-back guarantee. This means that in the highly unlikely event that everything we've predicted for you doesn't happen, you need only let us know and you're going to receive an immediate and full refund. So, you are not taking any risk at all by placing your faith in us and asking for our help.

It's now time to fill out and mail off your Special Assistance Form without delay. Patrick Guerin and I know life is going to give you everything you've ever wanted. Happiness is on its way to you.

Your devoted and sincere friend,




Maria Duval

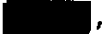
PS: In celebration of your NEW LIFE, we've prepared a mysterious and extraordinary gift for you - a powerful Talisman that can attract MONEY and LUCK. It's the same Talisman that Patrick Guerin carries with him all the time. He's never shared it before, but in your case he had no hesitation. The most powerful and ancient Talisman we have ever known is now YOURS!

You see, we've done everything possible to guarantee, very soon, your new life, with luck, money and happiness... Send off your Special Assistance form today!

On the back of your Special Help Form, you are going to find our comments about your future. Do not forget to read the personal letter on the next page that Patrick Guerin has written for you.

Exhibit A


 here is the letter that
Patrick Guerin has asked me to pass on to you

My dear ,

We have never met yet I know so many things about you!

Yes, I had very clear visions and I know your life is going to change very soon, but only if you make the right decisions today.

I know the life you're leading right now is not all you hoped for... I know you're currently immersed in serious problems that are casting a shadow over your existence... I also know you need URGENT help sorting out your money problems so that you can have a decent standard of living... And, finally, I know you deserve MUCH MORE out of life than you're currently getting.

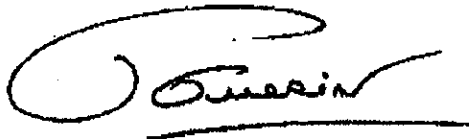
I've seen you winning an initial, very large, sum of money... I've seen all your most urgent problems find a solution, one after the other... I've seen a new life taking shape on your horizon, more wonderful and fulfilling that you could ever imagine... I've seen joy and happiness light up your face... I've seen a person full of energy, getting the absolute most out of life ... And that person is you !

I can say this and confirm it: Your life really is going to change, in ways more significant than you can imagine, and I'm not the only psychic to have seen it! I can't emphasize enough the fact that all the good things I saw heading your way. Maria Duval saw them too! I have never heard of this happening in the history of clairvoyance! So, this is irrefutable proof that your life really is going to change over the coming weeks!

Just imagine... For all this amazing happiness, and all this joy we have seen coming into your life, the only thing you have to do is agree to accept the help Maria Duval and I are offering you by simply returning the enclosed Special Assistance Form today. If I could do it for you I would, but unfortunately I can't do that. You and you alone can do this.

I am telling you to accept this sincere and selfless offer we are making you today. You won't regret it and your future happiness may depend on it. Maria Duval and I are awaiting your news with great impatience,

Your devoted and sincere friend,



P.S. Most important of all, do it now because your first Lucky Event is coming very soon!

Notes taken by me during the vision I had about you [REDACTED]

- [REDACTED]
- October 16, 2013
- Solutions
- September
- Powerball!
- Crucial personal meeting
- Luck
- Tuesday
- \$40,000.00
- 1924
- SEVERAL WINNINGS!!!
- Problems solved
- New life begins!
- Positive changes...
- HAPPINESS

Notes taken by Patrick Guerin during the visions he had:

- [REDACTED]
- October 16, 2013
- The solution or solutions
- September
- Big lottery win (Powerball?)
- One-on-one meeting
- Luck and chance
- \$40,000 (or more?)
- 1924
- Big winnings.
- Problems solved
- Rebirth!
- Changes
- Joy happiness

So, you see [REDACTED], there is no doubt; both Patrick Guerin and I saw the same happiness and the same changes linked to you! There is absolutely no reason why everything that we are predicting for you couldn't come true.

You are going to find your Special Assistance Form on the next page.

SPECIAL ASSISTANCE FORM FOR: [REDACTED]
Lottery prizes... problems solved... and a new life!

To be completed and returned as soon as possible to:

Maria Duval, c/o Destiny Research Center,
 1285 Baring Blvd. #411, Sparks, NV 89434-8673

(X) YES, my dear Maria, I would be absolutely delighted to accept this money and these changes for the better that are being offered to me today and that both you and Patrick Guerin have seen coming into my life.

(X) Both of you saw for me, at the same time the following great changes:

- 1) A first happy event in 27 days.
- 2) Many major wins on games of chance.
- 3) An end to all my most urgent problems.
- 4) Good news in my relationships and my emotional life.
- 5) Other (significant) wins on games of chance!
- 6) A totally new and much happier life!

Yes, I want these transformations in my life and so would ask you kindly to perform:

(X) My Grand Ceremony which can make me a WINNER and allow me to SEE and SEIZE these many important opportunities that are coming my way, particularly in the area of MONEY!

And please send me:

(X) My mysterious talisman with the power to attract LUCK and MONEY.

(X) My Invaluable Guide to my New Life, in which I'm going to find all the information I need to grasp my many chances at exactly the right time when they come along. Such as for example: The days and numbers I should play to maximize my chances to win, and win BIG! What I need to do to change my life and see an end to my problems.

(X) What you most want for me is my happiness. That's why you've decided to offer me the first part of your help for free, I only pay the cost of the preparation and mailing of my Invaluable Guide to a New Life (just \$50) which I am enclosing with this Assistance Form in the following manner:

I enclose a () check or () money order for a total of \$50, (which includes all fees and first-class delivery fees) made out to: Destiny Research Center, or () cash.
 Or by Credit Card: () Mastercard () Visa
 Card Card No: _____

Please check your address below and, if necessary, correct using CAPITAL LETTERS. Thank you.

My address is:

[REDACTED ADDRESS]

Expiry date (MM/YY): ____ / ____

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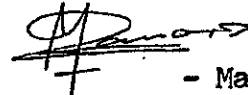
Signature: _____

I confirm that my birthdate is:

[REDACTED BIRTHDATE]

Your Complete Guarantee of Satisfaction

IMPORTANT: In order to eliminate any risk on your part, we're offering you a full lifetime money-back guarantee in the very unlikely event that what we're predicting for you doesn't happen. So, you've got absolutely nothing to lose by putting your faith in us and asking for our help.


 - Maria